

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

In re: §
KrisJenn Ranch, LLC, § Chapter 11
§
§
Debtor § Case No. 20-50805-RBK
§

KrisJenn Ranch, LLC, KrisJenn Ranch, LLC— §
Series Uvalde Ranch, and KrisJenn Ranch, §
LLC—Series Pipeline ROW, as successors in §
interest to Black Duck Properties, LLC, §
§
Plaintiffs, § Adversary No. 20-05027-RBK
§
v. §
§
DMA Properties, Inc. and Longbranch §
Energy, LP, §
§
Defendants. §
§

DMA Properties, Inc. and Frank Daniel §
Moore, §
§
Cross-Plaintiffs/Third-Party Plaintiffs, §
§
v. § Adversary No. 20-05027-RBK
§
KrisJenn Ranch, LLC, KrisJenn Ranch, LLC— §
Series Uvalde Ranch, and KrisJenn Ranch, §
LLC—Series Pipeline ROW, Black Duck §
Properties, LLC, Larry Wright, and John §
Terrill, §
§
Cross-Defendants/Third-Party Defendants. §

**RESPONSE TO OBJECTIONS AND MOTION TO QUASH SUBPOENA SEEKING THE DEPOSITION OF HAGAN
COHLE AND THE PRODUCTION OF DOCUMENTS
[RELATES TO DKT. 73]**

In his motion to quash, Mr. Cohle objects and seeks to quash his subpoena to testify at a deposition in this case on two grounds: (1) he was served with an unsigned subpoena; and (2) he objects to appearing at the office of counsel for DMA Properties and Mr. Moore when he is represented by counsel.

After a conference between counsel for Mr. Cohle and counsel for DMA Properties and Mr. Moore on available dates, Mr. Cohle was served with a revised subpoena through his counsel. The revised subpoena was signed by counsel for DMA Properties and Mr. Moore. Mr. Cohle's deposition will now be conducted on October 16, 2020 at the office of his counsel via video conference. There are no remaining objections concerning Mr. Cohle's deposition.

Further, Mr. Cohle objected to producing documents from his role as manager of Black Duck Properties, arguing that the requests for production should be directed at Black Duck. Black Duck, however, had no corporate email server and no document retention policy. In his role as Black Duck's manager, Mr. Cohle used his personal email address. To the extent Mr. Cohle has communications and documents from his time as Black Duck's manager that are responsive to DMA Properties's and Mr. Moore's requests for production, those documents should be produced.

Respectfully submitted,

/s/ Christopher S. Johns

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CERTIFICATE OF SERVICE

I hereby certify that on September 29, 2020 a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States Mail, first class, postage prepaid, at the address noted below.

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